

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-381, 413-414)
(August 3, 2006)

The United States Postal Service hereby objects to interrogatories DBP/USPS-381, 413, and 414, filed on July 24, 2006. The interrogatories read as follows:

DBP/USPS-381. Please refer to your response to Interrogatory DBP/USPS-166 subpart a. The response that was provided did not address whether there are any restrictions that exist for setting various cut-off times, such as, must the cut-off time for 2-day Express Mail be no earlier than 5 PM. Please reanswer the original Interrogatory and provide the rationale for your response.

DBP/USPS-413. Please refer to your response to Interrogatory DBP/USPS-206. Please have the expert on Express Mail advise any reason[s] that he/she is aware of that would allow for one not to consider that the average price per Express Mail article would be the same for those articles that are delivered on time as compared to those that are not delivered on time.

DBP/USPS-414. Please refer to your response to Interrogatory DBP/USPS-207. Please have the expert on Express Mail advise any reason[s] that he/she is aware of that would allow for one not to consider that the average price per Express Mail article would be the same for those articles that are not delivered on time and for which a claim for postage refund was filed as compared to those that a claim for postage refund was not filed for.

The Postal Service objects to all of these interrogatories on the grounds of relevance.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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